

CRIMINAL COMPLAINT

I, Special Agent Lindsay Hogan, with the Federal Bureau of Investigations, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about February 7, 2025, the defendant, **Michael Huffman**, in the Northern District of Texas, did knowingly distribute child pornography using any means and facility of interstate and foreign commerce, namely the Internet. Specifically, **Huffman** distributed the following visual depiction:

Pretzels_3	Video file depicts a prepubescent female with blonde
·	hair, wearing a purple shirt, displaying her vagina in a
	lewd a lascivious manner.

In violation of 18 U.S.C. § 2252A(a) (2).

I further state I am a Special Agent with the Federal Bureau of Investigations (FBI) and that this complaint is based on the following facts gathered by me:

INTRODUCTION

1. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI), since September 2021. I am currently assigned to the Violent Crimes Task Force in the Dallas-Fort Worth Division.

During my time as a Special Agent, I have investigated cases involving computer-related criminal activity and violent crimes against children. As an FBI Special Agent, I am authorized to investigate violations of United States laws, including violations relating to child exploitation and child pornography such as the production, transportation, receipt, distribution, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252, and 2252A. I have gained experience in conducting these investigations through training and through everyday work, including executing search warrants and interviewing individuals who sexually exploit and abuse minors and who possess and trade child pornography. I have also received FBI Crimes Against Children training, which includes training in the investigation and enforcement of federal child pornography laws in which computers and other digital media are used as a means for receiving, transmitting, and storing child pornography.

2. I make this affidavit in support of criminal complaint charging Michael Huffman, while in the Fort Worth Division of the Northern District of Texas, with a violation of 18 U.S.C. § 2252A(a)(1) & (2), that is, distribution of child pornography. The statements contained in this affidavit are based on information provided by FBI Special Agents and other members of law enforcement; information gathered from the service of legal process; the results of physical and electronic surveillance conducted by law enforcement agents; and my experience, training and background as a special agent with the FBI. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation.

Instead, I have set forth only the facts that I believe are necessary to establish probable cause to believe that Michael Huffman did knowingly commit the offense described herein.

FACTS SUPPORTING PROBABLE CAUSE

- In September 2023, FBI Honolulu arrested a subject for possession and 3. distribution of Child Sexual Abuse Material (CSAM)1. Following an interview with the subject, consent was given for an FBI Online Covert Employee (OCE) to assume the subject's online identity, "[redacted]737" on Social Media Platform A (Platform A) and Social Media Platform B (Platform B). 2 Historically, "[redacted]737" had been communicating with an individual on Platform B with the online identity "R[redacted] (@[redacted]63)" beginning approximately in April 2023. On and after September 6, 2023, the FBI OCE assumed the online identity [redacted]737 on Platform B and continued conversations with "R[redacted] @[redacted]63.
- FBI OCE observed Platform B user "R[redacted] @[redacted]63" in groups 4. dedicated to sharing CSAM, including several in which he was the moderator. A few groups are listed below:
 - Creepshots all ages
 - Girls 0-16 No Limits V3.0
 - Youth of today
 - Young Hair Pussy

¹ For purposes of this affidavit, "child sexual abuse material," or CSAM, has the same meaning as the term "child pornography" as defined in 18 U.S.C. § 2256.

² Because investigations related to users on these platforms are ongoing, this affidavit references the two platforms as A and B.

- On November 9, 2023, working with International Law Enforcement 5. partners, FBI Honolulu was able to obtain information associated with the Platform B account for "R[redacted] @[redacted]63." The following was provided as information relating to "R[redacted] @[redacted]63":
 - Handle: @[redacted]63
 - Identificator: eb5d2576-d251-4ad5-b344-1217f9190717
 - No push tokens registered
 - E-Mail: [redacted]lr4@gmail.
- 6. On February 5, 2024, FBI Fort Worth served legal process to Google Inc. for subscriber information for email address [redacted]lr4@gmail.com. On February 6, 2024, Google Inc. responded with the following account holder information:
 - Subscriber Name: R[redacted]
 - Google Account ID: 973859994657
 - Created on: 2020-12-18 Last Updated On: 2023-12-20
 - Recovery e-Mail: [redacted]gii@gmail.com
- 7. On February 23, 2024, FBI Fort Worth served legal process to Google Inc. for subscriber information for email address [redacted]gii @gmail.com. On February 24, 2024, Google Inc. responded with the following account holder information:
 - Subscriber Name: R[redacted]
 - Google Account ID: 798738551104
 - Created on: 2018-09-11
 - Last Updated On: 2021-10-05
 - Recovery SMS: [redacted]-1245

- 8. On March 26, 2025, FBI Fort Worth served legal process to AT&T for the account associated with phone number [redacted]-1245 through March 26, 2025. On March 27, 2025, AT&T responded and confirmed the following:
 - User: Mike Huffman
 - User Address: [redacted] Mistys Run, Fort Worth, Texas 76244
 - Service Start Date: January 19, 2010- Current
- 9. On April 17, 2025, I obtained a federal search warrant in the Northern District of Texas to search Huffman's residence on Mistys Run, which is located in the Northern District of Texas, and to seize electronic devices and evidence related to the previously described child pornography investigation. On April 22, 2025, Agents and Task Force Officers with the FBI served the federal search warrant.
- 10. When Agents arrived at the residence, **Huffman** was seated in a chair in his driveway with a laptop computer, described as a grey HP laptop, with the Platform B application open as well as folders containing CSAM.
- 11. Agents read Huffman his Miranda warnings, after which, Huffman consented to an interview. During the interview, **Huffman** claimed ownership of the Platform B account with username "R[redacted] @[redacted]63" and admitted to sending and receiving numerous CSAM files over Platform B over the course of several years. He also stated that he sent the CSAM from his home using his laptop computer.
- 12. During the service of the search warrant, FBI personnel performed an onscene preview of Huffman's laptop computer. FBI personnel were able to locate several files depicting child pornography.

FBI personnel observed the Platform B application on his laptop with the log in page which included the email [redacted]lr4@gmail.com and username "R[redacted] @[redacted]63". Further examination identified Huffman, using Platform B username "R[redacted] @[redacted]63," distributing several CSAM files, including the file referenced in paragraph one, which occurred on or about February 7, 2025. I have reviewed this file, and it appears to depict a real minor engaged in sexually explicit conduct, that is, the lewd and lascivious exhibition of the genitals of a prepubescent minor female child.

13. I am aware that the Internet is a means and facility of interstate and foreign commerce. Accordingly, Huffman used a third-party application and software, which requires the use of the Internet, a means and facility of interstate commerce, to distribute the visual depiction described in paragraph one of this affidavit.

CONCLUSION

In consideration of the above, I respectfully request the Court issue a 14. warrant authorizing the arrest of Michael Huffman.

Federal Bureau of Investigation

Subscribed and sworn to before me on this _

23

day of April 2025 at

//// (m)/p.m., in Fort Worth, Texas.

JEFFREY L. CURETON

UNITED STATES MAGISTRATE JUDGE